



Delivering Energy to Improve Lives

Summary of Kinder Morgan Technical Testimony: General Provisions (Section 112)

Proposed Rule 20.2.50 – Oil and Gas Sector – Ozone Precursor Pollutants
Commencement of Hearing: September 20, 2021

- Leslie Nolting, EHS Specialist / EHS Manager – Air Permitting Compliance, Kinder Morgan
- Resume and qualifications at Exhibit I of the Kinder Morgan NOI to Present Direct Technical Testimony

- Section (2) of Paragraph (B) of NMAC 20.2.50.112

(2) Sources subject to emission standards and monitoring requirements under this Part shall be inspected monthly to ensure proper maintenance and operation, unless a different schedule is specified in the Section applicable to that source type. If the equipment is shut down at the time of required periodic testing, monitoring, or inspection, the owner or operator shall not be required to restart the unit for the sole purpose of performing the testing, monitoring, or inspection, but shall note the shut down in the records kept for that equipment for that monitoring event.

Clarification regarding inspection frequencies

- In its NOI, NMED states that the monthly inspection requirement set out in Section 112 “is the minimum periodic monitoring requirement for sources subject to Part 50 and requires owners and operators to evaluate the overall operation of the source.” NMED’s NOI, Ex. 32, at 28.
- This reads contradictory to NMED’s the plain language of Section 112, which requires monthly monitoring “unless a different schedule is specified in the Section applicable to that source type.” NMED’s NOI, Ex. 41, Section 112.B.(1).
- We simply ask that NMED confirm that it does not intend to require monthly monitoring in each section as the minimum frequency, regardless of the schedule set in that section

Questions?